UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO WESTERN DIVISION (TOLEDO)

HOWARD FRANK, Individually and On Behalf of All Others Similarly Situated,) No. 3:05-cv-07393-JGC) (Consolidated)
Plaintiff,)) <u>CLASS ACTION</u>
vs.) Judge James G. Carr
DANA CORPORATION, et al.,))
Defendants.)
)

MOTION FOR ADMISSION PRO HAC VICE FOR DEBRA J. WYMAN

LANDSKRONER • GRIECO • MADDEN, LTD. JACK LANDSKRONER (0059227) 1360 West 9th Street, Suite 200 Cleveland, OH 44113 Telephone: 216/522-9000

Liaison Counsel

216/522-9007 (fax)

LERACH COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP MICHAEL J. DOWD 655 West Broadway, Suite 1900 San Diego, CA 92101 Telephone: 619/231-1058 619/231-7423 (fax)

Lead Counsel for Plaintiffs

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NOW COME the movants, SEIU Pension Plans Master Trust, West Virginia Laborer's

Pension Trust Fund and Plumbers and Pipefitters National Pension Fund, by and through their

counsel, Jack Landskroner of Landskroner • Grieco • Madden, Ltd., respectfully requesting an Order

be entered permitting attorney Debra J. Wyman to appear pro hac vice in the pending matter. In

support of the motion, movants state as follows:

1. Attorney Wyman is in good standing with the California Bar as evidenced by the

Certificate of Good Standing from the State Bar of California, attached hereto as Exhibit A.

2. At no time has attorney Wyman been sanctioned by any court nor disciplined by any

association. Nor are there any pending unresolved matters.

3. Attorney Wyman will abide by all the rules, regulations and procedures of the State of

Ohio and will be subject to the contempt citation of the Court.

4. Pursuant to Local Rule 83.5(h), the information required for Debra J. Wyman is as

follows:

Debra J. Wyman (California Bar No. 190812)

LERACH COUGHLIN STOIA

GELLER RUDMAN & ROBBINS LLP

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San Diego, CA 92101

Telephone: 619/231-1058

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debraw@lerachlaw.com

DATED: June 9, 2006 ANDSKRONER • GRIECO • MADDEN, LTD.

s/ Jack Landskroner

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Lead Counsel for Plaintiffs

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Additional Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Jack Landskroner

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Mailing Information for a Case 3:05-cv-07393-JGC

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- Anthony J. Calamunci, Sr. acalamunci@ralaw.com bbreier@ralaw.com
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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

• (No manual recipients)